

CHEMCLENE CORPORATION  
RCRA PERMITTING  
PART A PERMIT APPLICATION  
NOTIFICATION

CHEMCLENE CORPORATION  
ADMINISTRATIVE RECORD \*  
INDEX OF DOCUMENTS

RCRA PERMITTING  
Part A Permit Application  
Notification

- 1) U.S. EPA Notification of Hazardous Waste Activity form, 8/18/80. P. 1-2.

Correspondence and Part A Supporting Documentation

- 1) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, re: Acknowledgement of the application for a Hazardous Waste Permit, 12/23/80. P. 1-1.
- 2) Record of Communication to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Paul Gotthold, U.S. EPA, re: Part A Application Submittal, 4/23/81. P. 2-2.
- 3) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Ms. Shirley D. Bulkin, U.S. EPA, re: Part A Hazardous Waste Permit Application, 7/20/81. P. 3-5. An Interim Status form is attached.
- 4) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Ms. Shirley D. Bulkin, U.S. EPA, re: Request to change the Conditions of Operations During Interim Status, 12/21/81. P. 6-7. An Amended Conditions of Operation During Interim Status form is attached.
- 5) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Patrick Anderson, U.S. EPA, re: Request to change the Conditions of Operations During Interim Status, 2/18/82. P. 8-10. An Amended Conditions of Operation During Interim Status form and a Description of Hazardous Wastes form are attached.

Part A Permit Application

- 1) U.S. EPA Part A Hazardous Waste Permit Application form, 11/19/80. P. 1-8.

\* Administrative Record available 10/20/88.

Note: Company name or organizational affiliation is identified in the index only when it appears in the record.

RCRA PERMITTING  
Part B Permit Application  
Permit Correspondence

- 1) Letter to Mr. Paul Gotthold, U.S. EPA, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Modification of the hazardous waste permit application, 5/22/81. P. 1-1.
- 2) Letter to Mr. Paul Gotthold, U.S. EPA, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Modification of the hazardous waste permit application, 10/23/81. P. 2-2.
- 3) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Review of RCRA Permit Application, 3/8/85. P. 3-6b. Two certified mail receipts are attached.
- 4) Letter to Mr. Stephen R. Wassersug, U.S. EPA, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Additional information request from EPA, 8/1/85. P. 7-8.
- 5) Memorandum to File from Mr. Greg Koltonuk, U.S. EPA, re: Trip Report to Chemclene site in Malvern, PA, 10/8/87. P. 9-10.

CORRECTIVE ACTION  
Facility Investigation  
Correspondence

- 1) Letter to Mr. Bruce Beitler, Pennsylvania Department of Environmental Resources (PADER), from Mr. King Graver, Chemclene Corporation, re: Recent findings at the former disposal area, 4/23/82. P. 1-2.
- 2) Letter to Mr. King Graver, Chem-Clene [sic] Corporation, from Mr. Bruce D. Beitler, PADER, re: Agreements reached at the May 25, 1982 meeting concerning cleanup of the former waste disposal areas and associated groundwater contamination, 6/11/82. P. 3-4.
- 3) Letter to Ms. Marilyn Shup, PADER, from Mr. King Graver, Chemclene Corporation, re: Request for permit to discharge water treated by aeration, 7/1/82. P. 5-5.
- 4) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Victor Janosik, PADER, re: Waste dump cleanup and future monitoring, 5/10/83. P. 6-7.
- 5) Letter to Mr. James Heenehan, U.S. EPA, from Mr. Marc E. Gold, Wolf, Block, Schorr and Solis-Cohen, re: EPA's request for information concerning Chemclene Corporation, 6/1/83. P. 8-9.
- 6) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Victor Janosik, PADER, re: Agreements reached at the May 31, 1983 meeting, 6/13/83. P. 10-11.
- 7) Letter to Mr. Pat McManus, U.S. EPA, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Response to a site visit on July 14, 1983 and transmittal of information requested on May 25, 1983, 7/83. P. 12-26. The following are attached:
  - a) Cedar Grove Environmental analytical report of May 7, 1981 samples;
  - b) Cedar Grove Environmental analytical report of January 30, 1981 samples;
  - c) AGES Laboratory analytical report of composite sample of material removed from open pit on November 16, 1982;
  - d) Quality Control Laboratory analytical report of September, 16, 1982 samples;
  - e) Quality Control Laboratory analysis for sample numbers 6540-6544;
  - f) a letter from the U. S. Department of Interior regarding the transmittal of an analytical report of sample taken from water well number 36;
  - g) U. S. Department of Interior water quality analysis;
  - h) Quality Control Laboratory analysis for sample numbers 6068-6079.
- 8) Letter to Mr. James Heenehan, U.S. EPA, from Mr. Marc E. Gold, Wolf, Block, Schorr and Solis-Cohen, re: Cleanup actions at Chemclene, 7/22/83. P. 27-28.

- 9) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Tucker Moorshead, Earth Data Incorporated, re: Effectiveness of pumping CC-3 to create a core of influence in the vicinity of the Chemclene Corporation plant, 9/12/83. P. 29-34. A location map and two well pumping graphs are attached.
- 10) Memorandum to Chem-Clene [sic] File from Mr. Victor Janosik, re: Meeting minutes from September 9, 1983 concerning the cleanup of contaminated soils in the "open pit" and groundwater recovery from the former disposal area, 9/16/83. P. 35-36.
- 11) Letter to Mr. Victor J. Janosik, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Progress report of the cleanup of former disposal area, 9/21/83. P. 37-39.
- 12) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Victor J. Janosik, PADER, re: Information and proposal concerning the removal of contaminated liquid and soils from the "open pit" area, 10/28/83. P. 40-41.
- 13) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Victor J. Janosik, PADER, re: Meeting held on December 22, 1983, 12/30/83. P. 42-43.
- 14) Letter to Mr. King Graver, Chemclene Corporation, from Mr. Joseph A. Feola, PADER, re: Request for permit to discharge treated groundwater, 1/5/84. P. 44-45.
- 15) Letter to Mr. Joseph A. Feola, PADER, from Mr. King Graver, Chemclene Corporation, re: Acknowledgement of receipt of U.S. EPA letter dated January 5, 1984, 1/30/84. P. 46-46.
- 16) Letter to Mr. Victor Janosik, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Transmittal of the Proposed Groundwater Retrieval Plan For The Former Disposal Area, 2/6/84. P. 47-75. The Groundwater Retrieval Plan is attached.
- 17) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Victor Janosik, re: Receipt of the Groundwater Retrieval Plan, 2/17/84. P. 76-76.
- 18) Letter to Mr. Joseph Feola, PADER, from Mr. King Graver, Chemclene Corporation, re: Response to PADER's request for a new design and implementation schedule for groundwater recovery, 2/27/84. P. 77-77.
- 19) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Victor J. Janosik, PADER, re: Meeting held on April 16, 1984 at Chemclene Corporation, 4/18/84. P. 78-79.
- 20) Letter to Mr. Victor Janosik, PADER, from Mr. King Graver, Chemclene Corporation, re: Status report of cleanup, 6/84. P. 80-80.
- 21) Letter to Mr. Victor J. Janosik, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Analytical results of the sampling of groundwater wells, 6/29/84. P. 81-81.

- 22) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Victor J. Janosik, PADER, re: Summary of points discussed and agreements made during the July 2, 1984 meeting at Chemclene, 7/10/84. P. 82-84.
- 23) Letter to Mr. Victor J. Janosik, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Analytical results of soil samples from the backhoe trench in the bottom of the open pit, 7/12/84. P. 85-86. The analytical results are attached.
- 24) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Tucker Moorshead, Earth Data Incorporated, re: Closure of open excavation at the former disposal area, 7/25/84. P. 87-88.
- 25) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Victor J. Janosik, PADER, re: Soil samples from the "open pit," 8/6/84. P. 89-90.
- 26) Special Analysis Report forms for soil sample numbers 2114247-211254 and well sample numbers 2114227-2114229, prepared by PADER, 8/7/84. P. 91-101.
- 27) Letter to Ms. Marilyn Shup, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Test results of Chemclene's roof mounted water treatment system, 8/16/84. P. 102-103. The results are attached.
- 28) Letter to Mr. Mark diFelicianantonio, U.S. EPA, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Technical proposal describing how the open pit would be filled in and completed, 8/17/84. P. 104-104.
- 29) Letter to Mr. Victor Janosik, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Analytical results of soil samples from the open pit, 8/17/84. P. 105-105.
- 30) Letter to Mr. W. Lloyd Balderston, Chemclene Corporation, from Mr. Joseph A. Feola, PADER, re: Proposed volatile organic compound recovery program, 8/30/84. P. 106-107.
- 31) Memorandum to Mr. Mark diFelicianantonio, U.S. EPA, from Ms. Paula Luborsky, U.S. EPA, re: Comments on the Groundwater Retrieval Plan for the former disposal area, 9/17/84. P. 108-109.
- 32) Letter to Mr. Bruce Bietler, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Progress report on the cleanup effort at Chemclene, 10/11/84. P. 110-111.
- 33) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Eugene W. Pine, PADER, re: Groundwater Retrieval Plan for the former disposal area, 11/14/84. P. 112-117.
- 34) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Eugene W. Pine, PADER, re: Groundwater Retrieval Plan and remedial actions at Chemclene Corporation, 1/16/85. P. 118-119.
- 35) Letter to Mr. Joseph A. Feola, PADER, from Mr. W. Lloyd Balderston, Chemclene Corporation, re: Emergency trial water treatment program, 3/22/85. P. 120-121. The treatment program is attached.

- 36) Report: Work Plan to Complete Remedial Investigation and Feasibility Study for the Malvern TCE Superfund Site, prepared by Earth Data Incorporated, 7/86. P. 122-238. References are listed on P. 148 and P. 188.
- 37) Memorandum to File from Mr. Greg Koltonuk, U.S. EPA, re: Spray irrigation system at Chemcene, 9/3/87. P. 239-239.
- 38) Memorandum to Mr. Joe Kotlinski from Mr. Bob Baner, re: Transmittal of the soil analysis conducted from the sample collected from the site, 6/28/88. P. 240-241. A special analysis report form for soil sample number 0110439 is attached. ✓

#### CORRECTIVE ACTION

##### Facility Remediation (Enforcement)

##### Draft 3008(h) and Negotiations/Correspondence

- 1) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Neil R. Swanson, U.S. EPA, re: Groun water monitoring data, 4/8/88. P. 1-1.
- 2) Memorandum to Mr. Steve R. Wassersug, U.S. EPA, from Mr. Steve Heare, U.S. EPA, re: Draft Corrective Action Order, 7/27/88. P. 2-2.
- 3) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Bruce R. Smith, U.S. EPA, re: Transmittal of the Resouce Conservation and Recovery Act (RCRA) Corrective Action Consent Order, 8/1/88. P. 3-74. A certified mail receipt and the consent order are attached.
- 4) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Neil R. Swanson, U.S. EPA, re: Meeting concerning 3008(h) RCRA Corrective Action Order, 0/12/88. P. 75-75.
- 5) Letter to Mr. Robert D. Fox, Wolf, Block, Schorr, and Solis-Cohen, from Mr. Joseph A. Kotlinski, U.S. EPA, re: Non-liability of EPA, 10/6/88. P. 76-76.

#### COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) INFORMATION

- 1) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Cedar Grove Environmental, re: Sample results for 1,1,2, Trichloroethylene analyses, 7/14/80. P. 1-1.
- 2) Report: A Site Inspection of Chemclene Corporation, TDD No. F3-8203-09, EPA No. PA-322, prepared by Ecology and Environment, Inc., 8/9/82. P. 2-56.
- 3) Report: A Toxicological Impact Assessment of Chemclene Corporation, TDD No. F3-8203-09, EPA No. PA-322, prepared by Ecology and Environment, Inc., 8/10/82. P. 57-81.
- 4) Letter to Mr. Lloyd Balderston, Chemclene Corporation, from Mr. Eugene W. Pine, U.S. EPA, re: Response to the Groundwater Retrieval Plan, 10/26/92. P. 82-92.

#### GUIDANCE

- 1) Report: Methylene Chloride, prepared by Clement Associates, 10/85. P. 1-4. References are listed on page 4.
- 2) Report: Tetrachloroethylene, prepared by Clement Associates, 10/85. P. 5-8. References are listed on pages 7 and 8.



- 3) Report: 1,1,1-Trichloroethane, prepared by Clement Associates, 10/85. P. 9-12. References are listed on pages 11 and 12.
- 4) Report: Trichloroethylene, prepared by Clement Associates, 10/85. P. 13-16. References are listed on pages 15 and 16.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

Chemclene Corporation  
Box 26, RD #1, Malvern, PA 19355  
PLEASE PLACE LABEL IN THIS SPACE

Phoenixville Pike  
Malvern, PA

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

RCRA SECTION  
EPA REGION III

AUG 18 80 000294

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F 00001435344521		8 00 8 18

## I. NAME OF INSTALLATION

CHEMCLENE CORPORATION

## II. INSTALLATION MAILING ADDRESS

## STREET OR P.O. BOX

3 BOX 26 RD #1

## CITY OR TOWN

MALVERN

## ST.

## ZIP CODE

PA 19355

## III. LOCATION OF INSTALLATION

## STREET OR ROUTE NUMBER

5 PHOENIXVILLE PIKE

## CITY OR TOWN

MALVERN

## ST.

## ZIP CODE

PA 19355

## IV. INSTALLATION CONTACT

## NAME AND TITLE (last, first, &amp; job title)

2 GRAVER KING G VICEPRESIDENT

## PHONE NO. (area code &amp; no.)

215-644-2986

## V. OWNERSHIP

## A. NAME OF INSTALLATION'S LEGAL OWNER

8 BALDERSTON RUTH

## B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F - FEDERAL  
M - NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

## C. INSTALLATION'S EPA I.D. NO.

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

A 0000001

**IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2 F002	3	4	5	6
7	8	9	10	11	12

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U080	32 U210	33 U226	34 U228	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>King Graver</i>	NAME & OFFICIAL TITLE (Type or print) KING GRAVER VICE PRESIDENT	DATE SIGNED 8/18/80
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CHEMCLENE CORPORATION  
RCRA PERMITTING  
PART A PERMIT APPLICATION  
CORRESPONDENCE AND SUPPORTING DOCUMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # PAD014353445

December 23, 1980

Chemclene Corporation  
Mr. W. Lloyd Balderston  
R.D. #1 Box 26  
Malvern, Pa. 19355

Re: Acknowledgment of Application for  
a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

AR000001





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

JUL 20 1981

Mr. W. Lloyd Balderston  
Chemclene Corporation  
RD # 1 Box 26  
Malvern, PA 19355

Dear Mr. Balderston:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

AR000003

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

*Shirley D. Bulkin*

Shirley D. Bulkin  
Chief, Administrative Support Section  
Permit Enforcement Branch

Enclosure

AR000004



Date Prepared: July . . , 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Chemclene Corporation

Location: 258 North Phoenixville Pk.  
Malvern, PA 19355

EPA I.D. No.: PAD 01 435 3445

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. W. Lloyd Bladerston, President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
S01	27,500 Gals.
S02	10,000 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

F002

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

AR000005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

December 21, 1981

Mr. W. Lloyd Balderston  
Chemclene Corporation  
RD #1, Box 26  
Malvern, PA 19355

Re: EPA I.D. No. PAD 01 435 3445

Dear Mr. Balderston:

This is to acknowledge receipt of your letter dated December 11, 1981 in which you request a change to "Conditions of Operations During Interim Status."

Enclosed is an amended form reflecting the change(s). If we can be of any further assistance, please do not hesitate to contact Ms. Joan Henry, a member of my staff, on 215-597-8751.

Sincerely yours,

A handwritten signature in cursive script, reading "Shirley D. Bulkin".

Shirley D. Bulkin  
Chief, RCRA Administrative Support Section  
Permit Enforcement Branch

Enclosure

AR000006

CONDITIONS OF OPERATION DURING  
INTERIM STATUS

Date Prepared: December 21, 1981 AMENDED

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: Chemcene Corporation

Location: 258 North Phoenixville Pk.  
Malvern, PA 19355

EPA I.D. No.: PAD 01 435 3445

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Chemcene Corporation  
Attn: Mr. W. Lloyd Balderston, President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>S01</u>	<u>87,890 Gals.</u>
<u>S02</u>	<u>25,000 Gals.</u>
<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>F002</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

AR000007



UNITED STATES ENVIRONMENTAL PROTECTION  
REGION III  
6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

JOY

February 18, 1982

Mr. W. Lloyd Balderston  
Chemclene Corporation  
RD #1, Box 26  
Malvern, PA 19355

Re: EPA I.D. No. PAD 01 435 3445

Dear Mr. Balderston:

This is to acknowledge receipt of your letter dated February 5, 1982  
in which you request a change to "Conditions of Operations During Interim  
Status."

Enclosed is an amended form reflecting the change(s). If we can be of any  
further assistance, please do not hesitate to contact Ms. Joan Henry, a  
member of my staff, on 215-597-8751.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Patrick Anderson", is written over the typed name.

Patrick Anderson  
Chief, RCRA Permit and Pesticides Section  
Air and Waste Management Division

AR000008

CONDITIONS OF OPERATION DURING

INTERIM STATUS

AMENDED

Date Prepared: February 18, 1982

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Chemlene Corporation

Location: 258 North Phoenixville Pk.  
Malvern, PA 19355

EPA I.D. No.: PAD 01 435 3445

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Chemlene Corporation  
Attn: W. Lloyd Balderston, President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>S01</u>	<u>87,890 Gals.</u>
<u>S02</u>	<u>25,000 Gals.</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

\*See Attachment

<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

AR000009

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W P A D C 1 4 3 5 3 4 4 5													W D U P												
13 14 15 16 17 18 19 20 21 22 23 24 25 26													13 14 15 16 17 18 19 20 21 22 23 24 25 26												

## DESCRIPTION OF HAZARDOUS WASTES (continued)

W Z O J Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F002	792,000	P	S02	*see letter May 22, 1981
2	U220	72,000	P	S01**	TRANSFERRED TO ANOTHER TSD FOR USE AS FUEL EXTENDER
3	U154			S01**	
4	U002			S01**	
5	U159			S01**	
6	U031			S01**	
7	U112			S01**	
8	K062			S01**	
9	F001			included in	
10	U002	line #1	S01**	for added waste codes	
	U019	above	S01**	lines 8 thru 15.	
12	U044		S01**		
13	U140		S01**		
14	U161		S01**		
15	U239		S01**		
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

AR000010

CHEMCLENE CORPORATION  
RCRA PERMITTING  
PART A PERMIT APPLICATION

Please print or  
(fill-in areas are)

the uns  
ed for el

Form Approved OMB No. 158-R0175

PAD 014353445

	X	
	X	
X		
	X	
	X	

	X
	X
	X
	X
	X

Chemclene Corporation

W. Lloyd Balderston, President

215

644

2986

~~R.D.#1, Box 26~~ 258 N PHOENIXVILLE PIKE

Malvern

PA

19355

258 North Phoenixville Pk

Chester

PA

19355

NA

000001



NTINUED FROM THE FRONT

in order of priority		A. FIRST	
28.1.8 (specify)	INDUSTRIAL ORGANIC CHEMICALS	13.5.6.9 (specify)	GENERAL INDUSTRIAL EQUIPMENT
28.9.9 (specify)	CHEMICALS & CHEMICAL PREPS		(specify)

Chemclene Corporation

P (specify)	215	644	2986
-------------	-----	-----	------

R.D.#1, Box 26

Malvern PA 19355

NA	NA	
NA	NA (specify)	
PAD 014353445	NA (specify)	

Chemclene Corporation is a distributor of virgin chlorinated solvents (trichloroethylene, tetrachloroethylene, 1,1,1-trichloroethane and methylene chloride) and a recycler of waste chlorinated solvents (same as those listed above plus Freon); recycling is accomplished by simple distillation. Chemclene is also a distributor for vapor degreasing equipment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
L. Lloyd Balderston, President	<i>L. Lloyd Balderston</i>	19 November 80

Please print or type in the unshaded areas only  
(fill-in areas are spaced for elite type, i.e., characters/inch).

Form Approved OMB No. 158-S80004

FORM



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**HAZARDOUS WASTE PERMIT APPLICATION**  
Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

PA00014353445

FOR OFFICIAL USE ONLY

APPLICATION APPROVED DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
ANK	S02	GALLONS OR LITERS			
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE CODE			UNIT OF MEASURE CODE		
GALLONS . . . . .	G	LITERS PER DAY . . . . .	V	ACRE-FEET . . . . .	A
LITERS . . . . .	L	TONS PER HOUR . . . . .	D	HECTARE-METER . . . . .	F
CUBIC YARDS . . . . .	Y	METRIC TONS PER HOUR . . . . .	W	ACRES . . . . .	S
CUBIC METERS . . . . .	C	GALLONS PER HOUR . . . . .	E	HECTARES . . . . .	Q
GALLONS PER DAY . . . . .	U	LITERS PER HOUR . . . . .	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP									
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	87,890 2,750 *	G		7				
2	S02	10,000 25,000 *	G		8				
3	T04	3840	U		9				
					10				

5/22/00 PLS see

AR0000003

# I. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T04 - RECLAMATION OF CHLORINATED SOLVENTS (TRICHLOROETHYLENE, TETRACHLOROETHYLENE, 1,1,1-TRICHLOROETHANE, DICHLOROMETHANE) BY DISTILLATION: TWO STILLs WITH A DESIGN CAPACITY OF 240 GAL/Hr, EACH. FREON IS ALSO DISTILLED

## IV. DESCRIPTION OF HAZARDOUS WASTES

**A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

## D. PROCESSES

### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				AR000004 included with above

NOTE: Photocopy this page before completing. You have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W P A D O 0 1 4 3 5 3 4 4 5										W DUP									
V. DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
A. EPA HAZARD. WASTE NO. (enter code)		B. ESTIMATED ANNUAL QUANTITY OF WASTE		C. UNIT OF MEASURE (enter code)		1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))									
1	F002	792,000	P	S02	T04	S01	*see letter May 22, 1981												
2	U220	72,000	P	S01**	TRANSFERRED TO ANOTHER TSD FOR USE AS FUEL EXTENDER														
3	U154			S01**															
4	U002			S01**															
5	U159			S01**															
6	U031			S01**															
7	U112			S01**															
8	K062			S01**							** see letter Oct 23, 1981. for added waste codes lines 8 thru 15. PG								
9	F001	Included in	S01	S02															
10	U002	line #1	S01																
11	U019	above	S01																
12	U044		S01																
13	U140		S01																
14	U161		S01																
15	U239		S01																
16																			
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21																			
22																			
23																			
24																			
25																			
26																			

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

N.A.

EPA I.D. NO. (enter from page 1)

F P A 0 0 1 4 3 5 3 4 4 5 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

40 03 02 0

LONGITUDE (degrees, minutes, & seconds)

075 33 05 6

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F G

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

W. LLOYD BALDERSTON, PRESIDENT

W. Lloyd Balderston

19 NOVEMBER 80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

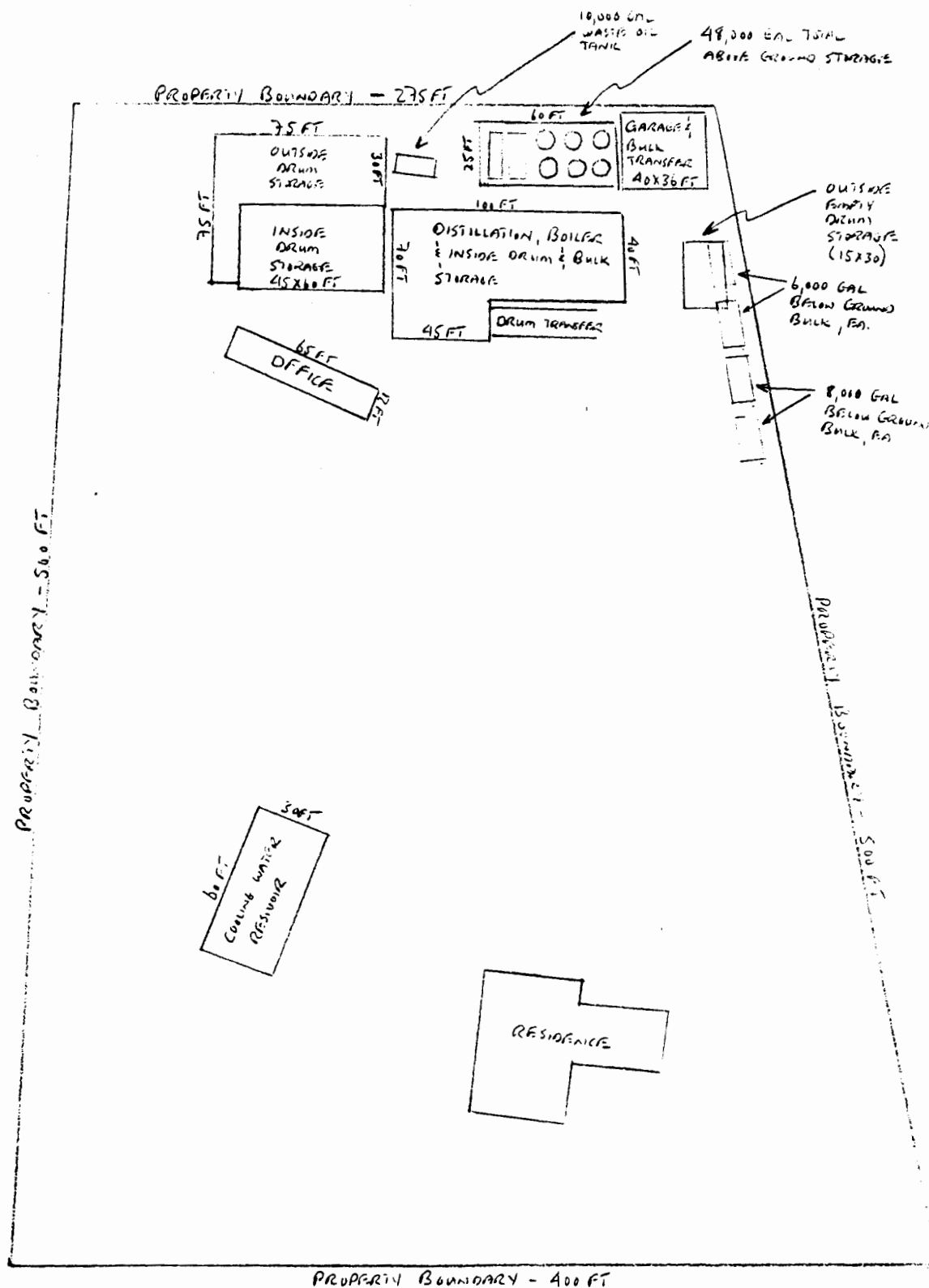
C. DATE SIGNED

N.A.

N.A.

N.A.

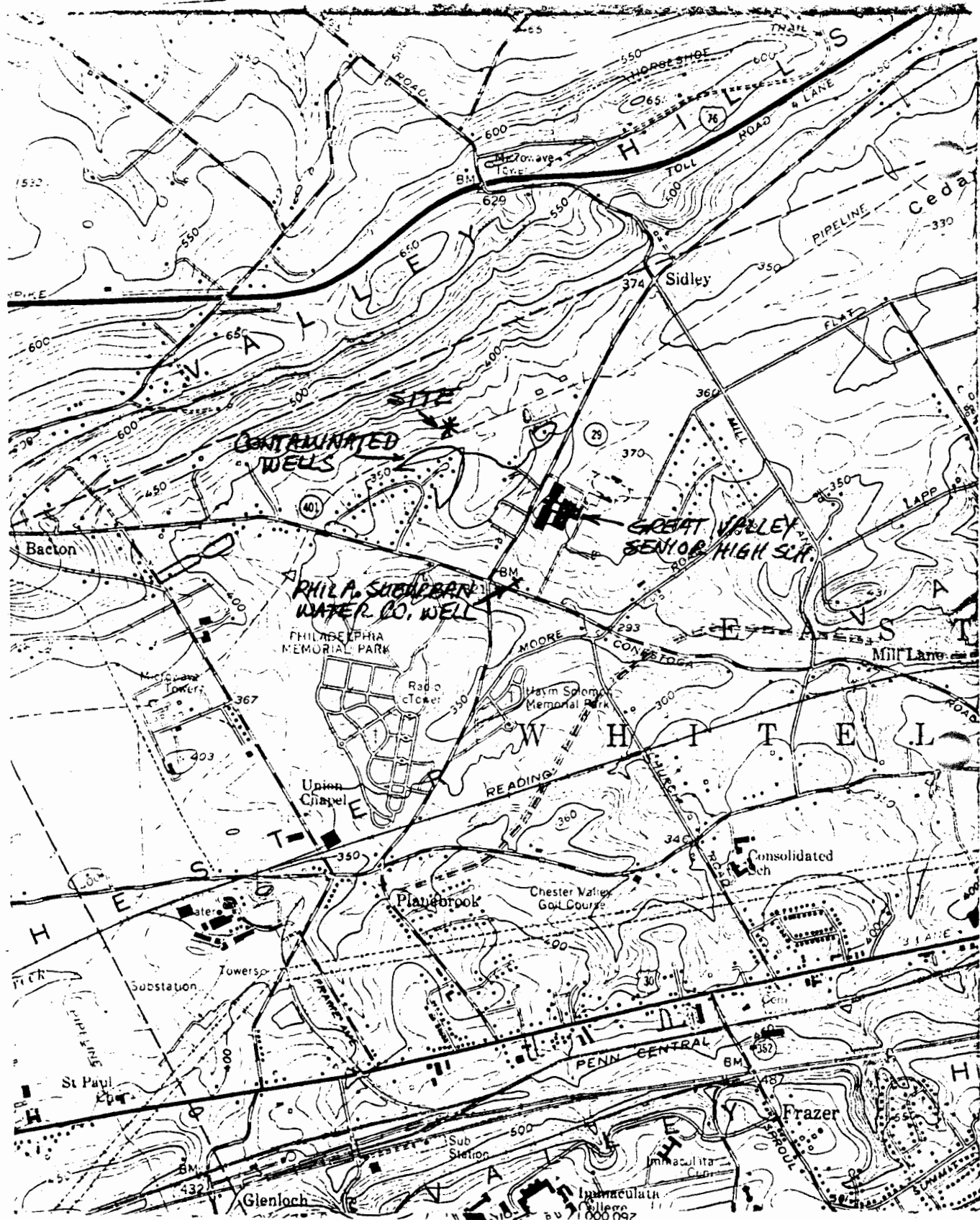
## V. FACILITY DRAWING (see page 4,



SCALE = 1 IN = 66.6 FT

AR000007





MALVERN 7 1/2' QUAD,

AR000008

CHLOROCENE CORPORATION  
RCRA PERMITTING  
PART B PERMIT EPA/STATE  
PERMIT CORRESPONDENCE



CHEMCLENE CORPORATION  
MALVERN, PENNSYLVANIA 19355

May 22, 1981

Paul Gotthold  
Mail Stop 3EN24  
U.S. E.P.A., Region III  
Sixth & Walnut Sts.  
Philadelphia, PA 19106

Dear Sir:

I am writing in reference to our hazardous waste permit application (PAD 014353445).

After speaking to you on the phone and some discussion here at Chemcene, we would like to change/modify some portions of the application.

On pages 1,2 and 3 we would like to delete T04 treatment as we have now determined that we do not fall under this catagory as we are a recycler.

On page 3, S01 should be added for the F002 waste; this was omitted by mistake.

Also, in checking over the application in preparation for this writing we noticed another mistake on page 1: The amount for S01 should be 27,500 not 2,750. This was a misplaced decimal error.

If you should have any questions, please call.

Sincerely

  
W. Lloyd Balderston

WLB:sdj

AR000001

CHEMCLENE CORPORATION

MALVERN, PENNSYLVANIA 19355

October 23, 1981

Mr. Paul Gotthold  
Mail Stop 3 En24  
U.S. E.P.A., Region III  
Sixth & Walnut Streets  
Philadelphia., Pa. 19106

Dear Mr. Gotthold,

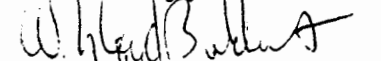
Confirming our conversation of a couple of weeks ago, and my letter of September 29, 1981, we would like to change the following portions of our hazardous waste permit application, (and thus some of the details of our interim status):

1. Page 3, line numbers 2 thru 7- do not delete; we handle under S01.
2. Add the following hazardous wastes to be handled.
  - a. Spent pickle liquors, K062 (S01)
  - b. Spent halogenated solvents, F001, (S01 & S02)
  - c. Acetone, U002, (S01)
  - d. Benzene, U019 (S01)
  - e. Chloroform, U 044, (S01)
  - f. Isobutyl alcohol, U 140 (S01)
  - g. Methyl isobutyl ketone, U 161 (S01)
  - h. Xylene, U239 (S01)
3. Increase our storage capacity in the following manner:
  - a. S01- 41,250 gals.
  - b. S02- 15,000 gals.

Please send us a copy of our application after these changes have been made as well as a copy of our new interim status.

Thank you.

Sincerely,

  
W. Lloyd Balderston

cc: Shirley D. Bulkin  
cam

AR000002

MAR 8 1985

Certified Mail  
Return Receipt Requested

EPA ID# PAD 01 435

Mr. W. Lloyd Balderston, President  
Chemclene Corporation  
258 No. Phoenixville Pike  
Malvern, PA 19355

Dear Mr. Balderston:

A review of our records indicates that Parts A and B of your RCRA Permit Application are currently under review by this office and the Pennsylvania Department of Environmental Resources.

On November 8, 1984 President Reagan signed and thus enacted the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization). The Amendments contain a number of far-reaching provisions that may impact the future operations of your facility.

We encourage you to stay abreast of developments relative to these new statutory provisions and we plan to provide guidance to you as it becomes available. The purpose of this letter, however, is to begin implementation of one aspect of the new Amendments relative to corrective action for past or future releases.

Section 3004(u) of the amended Resource Conservation and Recovery Act now requires:

"...a permit issued after the date of enactment... shall require corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a Treatment, Storage or Disposal facility seeking a permit under the subtitle."

The "Hazardous Wastes" referred to in this section are those identified in regulation 40 C.F.R. Part 261. "Hazardous Constituents" are those listed in Appendix VIII of regulation 40 C.F.R. Part 261. Other relevant terms are defined in Attachment A to this letter.

CONCURRENCE: 3HW32 POTOSNAK 3HW32 SOKOLOWSKI 3HW30 ALLEN 3HW00 WASSERSUG

3/1/85 AR000003

In order to proceed with the permitting process, EPA and the State must first determine the location of all "Solid Waste Management Units" (See Attachment A for definition) at your facility. This requirement extends to both operating units as well as those that are closing or have been closed in the past. Next, we must determine whether or not any "releases" (see definitions) originated at these units. In order to enable us to make these determinations, you should provide the following information:

- (1) A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one inch equal to not more than 200 feet. In addition to showing the location of the hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former Solid Waste Management Units (SWMU) at your facility.
- (2) For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide a copy of the closure plan or a description of how closure was performed and any relevant post-closure information you have available.
- (3) For each SWMU, provide a description of all the wastes processed by the units with emphasis on hazardous wastes and hazardous waste constituents. Also, provide information on time frames and quantities processed.
- (4) For each SWMU, describe any release (or possible release) originating at the unit. This should include information on the date of release, type of hazardous waste or hazardous waste constituents, quantity released, nature of the release, extent of released migration, and cause of release (i.e. overflow, broken pipe, tank leak, etc.). Also, provide any available data which would quantify the nature and extent of environmental contamination including the results of soil and/or groundwater sampling and analysis efforts. Likewise, monitoring information that indicates releases are not present should also be submitted.

If the above requested information is contained in your Part B or has been previously submitted to this office, please reference this information in your reply.

AR000004

We request under Section 3007 of the Act, 42 U.S.C. §6927, that you submit the above listed information within forty-five (45) days of your receipt of this letter to both EPA and the Pennsylvania Department of Environmental Resources. We recognize that in some cases, sufficient information will not presently be available to enable us to make corrective action determinations. For these cases, we plan to conduct on-site facility assessments and develop compliance schedules which would enable Permit Applicants to gather additional information leading to a corrective action decision under terms of a final effective RCRA Permit.

All information you submit should be certified as required by regulation 40 C.F.R. 270.11(d). Should you have any questions concerning this letter, please contact Mr. John Potosnak, P.E. at (215) 597-8338.

Sincerely,

Stephen R. Wassersug, Director  
Hazardous Waste Management Division

Enclosure

cc: Mr. Donald Lazarchik, Director  
Bureau of Solid Waste Management  
Pennsylvania Department of  
Environmental Resources

AR000005

### Definitions

Release - ...any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, but excluding releases otherwise permitted or authorized under law.

Solid Waste Management Unit -

...any landfill, surface impoundment, waste pile, land treatment unit, incinerator, tank (including storage, treatment, and accumulation tanks), container storage units, injection wells, wastewater treatment units, elementary neutralization units, transfer station, and recycling units that received solid or hazardous waste at any time.

AR000006

P 155 265 817

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014 PS Form 3800, Feb. 1982	Sent to	Mr. W. Lloyd Balderston Chemclene Corporation
	Street and No.	258 No. Phoenixville Pike
	P.O., State and ZIP Code	Malvern, PA 19355
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to whom and Date Delivered	
	Return receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
Postmark or Date		

AR000006A



PS Form 3811, July 1982

- **SENDER:** Complete items 1, 2, 3, and 4.  
Add your address in the "TURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

☒ Show to whom and date delivered .....

☐ Show to whom, date, and address of delivery .....

2. ☐ RESTRICTED DELIVERY .....

(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: Mr. W. Lloyd Balde  
Chemclene Corporation  
258 No. Phoenixville Pike  
Malvern, PA 19355

4. TYPE OF SERVICE:

☐ REGISTERED

☐ INSURED

☒ CERTIFIED

☐ COD

☐ EXPRESS MAIL

ARTICLE NUMBER

P 155 265

817

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE

☐ Addressee

☐ Authorized agent

*Wing Laver*

5. DATE OF DELIVERY

3-11-85

6. ADDRESSEE'S ADDRESS (Only if required)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS



\* GPO: 1983-579-003

RETURN RECEIPT

AR000006B



CHEMCLENE CORPORATION  
MALVERN, PENNSYLVANIA 19355

August 1, 1985

Stephen R. Wassersug, Director  
Hazardous Waste Management Division  
U.S. Environmental Protection Agency  
841 Chestnut Building  
Philadelphia, PA. 19107

Dear Mr. Wassersug:

With reference to your letters of 8 March 1985 and 24 July 1985 (3HW11) we apologize for our lack of response. Unfortunately, your letter of 8 March 1985 was misplaced here in my office.

Almost all of the information you are requesting is contained in Chemcene's Part B application submitted to the U.S. Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Resources (DER). This is particularly true of the activities and possible past releases at the currently active plant location. In addition, a considerable amount of hydrogeological data has been provided to the DER (and EPA via DER) over the past several years. A groundwater quality report (plus addendums) has been submitted in the past.

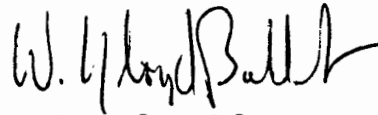
The only other Solid Waste Management Unit (SWMU) at Chemcene is the Former Disposal Area (FDA). While the location of the FDA is known to EPA and DER through CERCLA action, a topographical map of the appropriate scale is enclosed which shows the location of the plant and the FDA. No detailed information is available about the FDA which would satisfy your request Nos. 2,3, and 4 as this activity occurred prior to my activity with Chemcene and there were no such records kept.

AR000007

*Log of  
Rec'd 34422  
8/8/85  
ak*

Please let me know if you require additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Lloyd Balderston". The signature is fluid and cursive, with the first and last names being more prominent.

W. Lloyd Balderston

WLB/cm

CC: Donald Lazarchik (DER)  
Wayne Lynn (DER)  
Leon Kuchinski (DER)

AR000008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: Trip Report - Chemcene - Malvern, PA

DATE: 10/8/87

FROM: *gk* Greg Koltonuk  
PA RCRA Enforcement Section (3HW11)

TO: FILE

On September 18, 1987, I visited with Lloyd Balderston, president of Chemcene Corp. for a site visit and discussion of past and present treatment and disposal practices.

- (1) Chemcene is awaiting approval of the Part B for their outside (and enclosed) drum storage area. The drum storage area, installed in 1981 is also a receiving station where tankers unload virgin solvents for distribution. The receiving station/drum storage area is an open-end building with a concrete pad floor approximately 40 feet square.

The Part B, originally submitted in 1983, was revised by Chemcene in accordance with a DER request; however, Chemcene is still awaiting approval of the Part B.

- (2) When I mentioned to Mr. Balderston DER's comment in December, 1985 about the existence of a second contaminated area contributing to the VOA contamination, he mentioned that this is the receiving station area cited in Paragraph 1 above. He said that contamination is attributed to this area from past housekeeping practices; specifically, in the 1950s and 1960s, when trucks pulled up to the storage area to transfer solvents to drums, some of the solvents would inadvertently spill during the transfer; over a period of time, solvents from the solvent stained soils permeated to the groundwater table.
- (3) A second drum handling area is located approximately 100 feet from the receiving station/drum storage area. This area adjacent to the office building is used to load drums containing all spent solvent hazardous wastes and still bottom materials. These drums are then transported from Chemcene to licensed disposal areas. The office building also houses the two stills, used for solvent reclamation, and drums containing the waste solvent materials that are to be reclaimed.

AR000009

- (4) The old spray irrigation system is still attached to the office building but hasn't been used since the last samples were taken in January, 1985; the system will not be used again. A new spray irrigation system was constructed in 1986 by Chemclene; this system has not been used because DER has not approved its use. As with the old spray irrigation system, the final treated effluent from this system would also be deposited onto the ground surface.
- (5) Neither of the three groundwater recovery wells at the plant site or the two wells at the FDA are RCRA approved. Mr. Balderston feels that both wells at the FDA may be useless. He also said that well CC-3 at the plant area needs to be replaced.

AR000010